Ball-InCon Glass Packaging Corp.
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Reply to: P.O. Box 4200, Muncie, IN 47307-4200

July 28, 1993

Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, Washington 98101-2038

Attn: Fred L. Austin
Air Pollution Engineer

Re: PM_{10} Emission Cap

Dear Mr. Austin,

I would like to follow up on our discussion of a few weeks ago on the PM_{10} emission cap proposed by PSAPCA for our Seattle facility to meet requirements by EPA for the 1989 SIP revisions. Following a meeting of affected companies with EPA and PSAPCA on March 29, 1993 and your letter of April 15, 1993, PSAPCA proposed a set of calculations and assumptions for the cap for Ball-InCon and asked that they be reviewed. In a subsequent phone conversation on June 2, 1993, you suggested that we comment in writing on the methodology and assumptions made in the calculations and that Ball-InCon propose a limit for consideration because of delays in resolution of the issue between PSAPCA and EPA.

A copy of the PSAPCA calculations (4/15/93) of particulate emissions for the base year of 1988 are attached for reference. Total PM_{10} emissions for the three gas-fired furnaces, calculated as "highest actual", were 120,623 lb./year, or 60.31 tons/year. Total emissions calculated as "allowable" were 137,890 lb./year, or 68.95 tons/year. A review of this data is presented in Table I. Note that corrections have been made to the glass production figures used to calculate the actual annual emissions; the tonnages for Furnaces #3, #4, and #5 are from our records. The total annual tonnage of 225,286 for 1988 cited in your calculations is correct, so I'm not sure why the individual furnace tonnages are different. Using the correct furnace production figures gives slightly different emissions for each furnace but the adjusted annual total of 59.85 tons/year is still in good agreement with the original PSAPCA value of 60.31 tons/year.

We would like to propose that a PM_{10} emissions cap be based on the data and calculations in attached Table II. As you know, production rates vary for each furnace both seasonally and annually, based on customer requirements, general and local economic conditions and possible downtime for furnace repairs. A baseline calculation should consider the maximum annual tonnage for each furnace which is possible in a favorable business year, as shown by actual production data. We submit that use of the maximum annual tonnage for each fuel-fired furnace over the last three year period (1990-1992) is more representative of our current and future business in the Seattle area and a more meaningful measure of the capabilities of this plant. Using 1991 data for Furnaces #3 and #4, 1992 data for Furnace #5, and PSAPCA emission factors gives a total for particulate emissions from the three fuel-fired furnaces of 67.21 tons/year for the Seattle facility. Adding the PSAPCA value of 2.18 tons/year for fugitive emissions gives a total proposed emission cap for PM_{10} of 69.40 tons/year.

A cap of 69.40 tons of PM_{10} /year is a realistic value because it is based on actual annual production figures for these furnaces. A cap should not be determined by looking at a time period (1988) during which production on the fuel-fired furnaces was the second lowest in the past five years. We are not asking for 'extra' emissions and should not be penalized because a baseline may fall near a minimum in the business or economic cycle. It is important that the Seattle facility not be unduly constrained by limits based on partial production capacity of the facility. We are in full support of environmental improvements, the most recent example being the conversion of the Seattle #3 furnace to 100% oxygen-fuel firing earlier this year. As you know, we are planning two more oxy-fuel conversions in the next nine to twelve months, which will yield further improvements.

We will work with you to develop an equitable PM_{10} emissions cap that meets your requirements and, at the same time, provides Ball-InCon with the opportunity to contribute both environmentally and economically to the Seattle area. Please feel free to call me at 317-741-7145 to discuss any of the information in this proposal. I look forward to your comments and to the establishment of an equitable limit.

Sincerely,

MC Gridley

Marvin C. Gridley, PhD
Mgr., Environmental & Glass Technology

Attachments

cc: F. W. Glinka
F. Spicer
G. E. Hughes
P. P. Hopko
A. J. Cappellino